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8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
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11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:  
15 ALL ACTIONS

**OMNIBUS SEALING STIPULATION  
REGARDING DKT. NO. 1305 (JOINT  
LETTER BRIEF RE PLAINTIFFS’  
RFP NOS. 62, 69, 71, 72, 76, and 79)**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

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19 Pursuant to Civil Local Rules 7-11 and 79-5 and the Court’s May 22, 2023 Protective  
20 Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting  
21 Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively,  
22 “YouTube”) and Plaintiffs (collectively, the “Parties”) submit this Omnibus Sealing Stipulation  
23 in connection with the Parties’ Joint Letter Brief re Plaintiffs’ RFP Nos. 62, 69, 71, 72, 76, and  
24 79.

25 At this time, Plaintiffs do not oppose the sealing request and reserve all rights to  
26 challenge designations and sealing in the future. Accordingly, the Parties stipulate to the  
27 following chart.  
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**I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR PROVISIONAL REDACTIONS**

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
1305	Joint Letter Brief	Maintain redactions at 1, 4	Good cause exists to seal sensitive and confidential information about YouTube's internal crisis management strategies. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou ("Chiou Decl.") at 2.	A party has not previously sought to seal the same information.
1305	Joint Letter Brief	Maintain redactions at 2	Good cause exists to seal sensitive and confidential information about YouTube's confidential platform design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Chiou Decl. at 2.	A party has not previously sought to seal the same information.

1 **IT IS SO STIPULATED AND AGREED.**

2 Respectfully submitted,

3 DATED: November 15, 2024

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**ATTESTATION**

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 15, 2024

By: /s/ Christopher Chiou

Christopher Chiou